



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JN/DKK/LB/CJN  
F. #2017R05903

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 5, 2020

By Email and ECF

Michael Levy  
Joan M. Loughnane  
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David Bitkower  
Matthew S. Hellman  
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.  
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

<b>Document Description</b>	<b>Category of Discovery Pursuant to Protective Order</b>	<b>Bates Range</b>
Accounting and tax records	Discovery Material	DOJ_HUAWEI_A_0004784476 – DOJ_HUAWEI_A_0004874190

Very truly yours,

RICHARD P. DONOGHUE  
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By: /s/ Thea D. R. Kendler  
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cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)